

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

MARLON QUAN, ACORN CAPITAL
GROUP, LLC AND STEWARDSHIP
INVESTMENT ADVISORS, LLC,

Defendants,

and

ASSET BASED RESOURCE
GROUP, LLC AND FLORENE QUAN,

Relief Defendants.

Civil No. 11-723 ADM/JSM

MOTION FOR THE LIMITED
RELEASE OF FUNDS FOR THE
DEFENSE OF STEWARDSHIP
CREDIT ARBITRAGE FUND, LLC
AGAINST CIVIL CLAIMS

Pursuant to Rule 7 of the Federal Rules of Civil Procedure, Rule 7.1 of the Local Rules of the United States District Court for the District of Minnesota, and this Court's Order dated May 3, 2011, Defendants Marlon Quan, Acorn Capital Group, LLC, and Stewardship Investment Advisors, LLC hereby move the Court for an order granting the limited release of funds belonging to Stewardship Credit Arbitrage Fund, LLC ("SCAF") so that SCAF may retain counsel and defend itself against a civil complaint recently filed in the United States District Court for the Southern District of New York. This motion is based on the accompanying memorandum of law and exhibit attached thereto, any argument offered at a hearing on this motion, and the files and records of this case.

Dated: January 20, 2012

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